

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DETENTION WATCH NETWORK, CENTER FOR
CONSTITUTIONAL RIGHTS,

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND CUSTOMS
ENFORCEMENT, DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

DOCKET NO.: 14-CV-583 (LGS)

Document Electronically Filed

DECLARATION OF GHITA SCHWARZ IN SUPPORT OF
PLAINTIFFS' REPLY BRIEF

I, Ghita Schwarz, hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge:

1. I am an attorney at the Center for Constitutional Rights ("CCR"), co-counsel for Plaintiffs in this litigation. I am admitted to practice in this Court. I make this Declaration in Support of Plaintiffs' Reply Brief in Support of their Motion for Partial Summary Judgment.

2. Plaintiffs moved for Partial Summary Judgment on November 17, 2015. At that time, in support of Plaintiffs' motion, I submitted a declaration attaching Exhibits 1-12. In further support of Plaintiffs' motion, I now submit three additional Exhibits, beginning with Exhibit 13 for ease of reference.

3. Attached hereto as Exhibit 13 is a true and correct copy of a November 2013 staffing plan for the Hardeman County Correctional Facility in Whiteville, Tennessee, as produced by Tennessee Department of Correction on April 4, 2014 in response to a Public Record Request filed by Prison Legal News.

4. Attached hereto as Exhibit 14 is a true and correct copy of an August 2013 staffing plan for the South Central Correctional Facility in Clifton, Tennessee, as produced by Tennessee Department of Correction on April 4, 2014 in response to a Public Record Request filed by Prison Legal News.

5. Attached hereto as Exhibit 15 is a true and correct copy of a February 2009 staffing plan for the Whiteville Correctional Facility in Whiteville, Tennessee, as produced by Tennessee Department of Correction on April 4, 2014 in response to a Public Record Request filed by Prison Legal News.

Date: January 19, 2016
New York, New York

Respectfully submitted,

_____/s/_____

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